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March 22, 2013

The Honorable Ann D. Montgomery
United States District Court
13W U.S. Courthouse
330 South Fourth Street
Minneapolis, MN 55415

Re: *Stichting Pensioenfonds ABP v. Ally Financial Inc., et al.*,
Case No. 12-cv-01381-ADM-TNL (**the “ABP matter”**)

John Hancock Life Insurance Company, et al., v. Ally Financial, Inc., et al.
Case No. 12-cv-01841-ADM-TNL (**the “Hancock matter”**)

Dear Judge Montgomery:

We represent the plaintiffs in the ABP and Hancock matters before Your Honor and write to renew our request that the oral arguments for the Motions to Dismiss in both cases be consolidated. We have conferred with all Defendants in both cases on this issue and they do not oppose this request.

The two complaints (ABP and Hancock) are substantively identical. While there are different plaintiffs in the cases, because all of the RMBS certificates at issue were issued pursuant to registration statements and prospectus supplements that are highly similar, and in some cases identical, the fraudulent scheme, false statements alleged and claims are identical in both cases.

As you know, the Motions to Dismiss the Amended Complaint in the Hancock matter were filed on December 14, 2012, and Plaintiffs’ Opposition to the Motions to Dismiss was filed February 15, 2013. Defendants’ Reply in Support is due March 29, 2013. Oral argument in the Hancock matter is currently scheduled for April 18, 2013.

The Motions to Dismiss the Amended Complaint in the ABP matter were filed on March 11, 2013. The opposition brief in the ABP matter is due on April 25, 2013. Defendants’

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Reply in Support is due May 24, 2013. Oral argument is scheduled for June 18, 2013, in the ABP matter.

In the course of reviewing and opposing the various Defendants' motions to dismiss, it is now clear that the contested issues in both cases are substantially the same. To save judicial resources, and in light of the legal and factual similarities between the two cases, we respectfully request that both oral arguments be consolidated on June 18, 2013.

Consolidation of the oral argument is in the best interest of all parties because it will allow us to argue one set of facts based on two complaints that implicate virtually identical issues. Otherwise, the Court would be forced to waste its time with a second oral argument that addresses issues that virtually all were resolved during the first.

Respectfully Submitted,

Geoffrey C. Jarvis

cc: All counsel of record